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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Jane Doe  
\_\_\_\_\_  
  
\_\_\_\_\_,  
  
Plaintiff(s),  
  
vs.  
  
Lake County Sheriff  
\_\_\_\_\_  
  
Markoya  
\_\_\_\_\_,  
  
Defendant(s).

Case No. 1:25-cv-04815  
Judge Mary M. Rowland  
Magistrate M. David Weisman  
RANDOM / Cat. 2

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to “plaintiff” and “defendant” are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

1. This is a claim for violation of plaintiff’s civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff’s full name is Jane Doe\_\_\_\_\_.

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, Lake County Sheriff, is  
(name, badge number if known)

☒ an officer or official employed by Lake County Sheriff;  
(department or agency of government)  
\_\_\_\_\_ or

☐ an individual not employed by a governmental entity.

***If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.***

5. The municipality, township or county under whose authority defendant officer or official acted is Lake County. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about May 1, 2023, at approximately 4:52 ☐ a.m. ☒ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of Long Grove  
\_\_\_\_\_, in the County of Lake,  
State of Illinois, at 2424 Cumberland Circle,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☒ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☒ searched plaintiff or his property without a warrant and without reasonable cause;
- ☒ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☒ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

\_\_\_\_\_  
\_\_\_\_\_

- \_\_\_\_\_.
7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: ***(Leave blank if no custom or policy is alleged):*** \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_.
8. Plaintiff was charged with one or more crimes, specifically:
- Aggravated Battery against a individual 60 years of age or older
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
9. ***(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")*** The criminal proceedings
- ☐ are still pending.
- ☒ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows \_\_\_\_\_
- \_\_\_\_\_.
- ☐ Other: \_\_\_\_\_.

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<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

On 5/1/2023, a 911 call was placed by my 80+ years old mother, who suffers from

cognitive decline. The call arose from a non-violent family dispute between myself and my brother.

Although there was no physical violence or threat, my mother, in a state of confusion and fear,

called 911 to request a mental health evaluation for me. There was no report of a crime

during the 911 call—only a request for assistance.

Despite this, upon arrival, Officer Markoya of the Lake County Sheriff, accompanied by two other

officers, separated all family members (my mother, father, brother, and myself) into separate rooms

for questioning. In the course of this questioning, my mother's innocent efforts to help our family

resulted in the inadvertent miscommunication that she had been struck in the mouth with a closed

fist. This is factually false and a fabrication not based in reality.

Rather than conducting a thorough and impartial investigation, Officer Markoya interrogated me with

undue hostility. He dismissed my account of events and escalated the situation without cause. His

\*\*continued on page 7\*\*

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Emotional trauma and distress, financial duress, attorney's fees, reputation damage, professional damage, wrist injury affecting career as musician

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

**WHEREFORE**, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ **(Place X in box if you are seeking punitive damages.)** Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: \_\_\_\_\_

Plaintiff's name **(print clearly or type)**: Eunice Lee (Jane Doe) \_\_\_\_\_

Plaintiff's mailing address: 2424 Cumberland Circle \_\_\_\_\_

City Long Grove State IL ZIP 60047 \_\_\_\_\_

Plaintiff's telephone number: ( 847 ) 347-0808 \_\_\_\_\_.

Plaintiff's email address **(if you prefer to be contacted by email)**: ELFMO1970@gmail.com \_\_\_\_\_

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

***If yes, please list the cases below.***

***Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.***

Section 4 (Additional Defendant)

Defendant, Markoya, Badge # 1990, is an officer or official employed by Lake County Sheriff

Section 10 (continued)

behavior became so confrontational that his raised voice forced my brother to enter the room uninvited to de-escalate the situation, confirming that I posed no threat. I am approximately 100 lbs and I estimate Officer Markoya to be approximately 225-250 lbs.

Officer Markoya's behavior suggests a predetermined intention to justify an arrest rather than to determine the truth. This "investigate-to-arrest" mindset, absent justifiable and truthful probable cause, violates both my civil rights and law enforcement's duty to investigate fairly and impartially. The Lake County Sheriff also bears responsibility for its failure to ensure critical information (such as the nature of the 911 call and my mother's request for help, not an arrest for any crime) was relayed accurately and contextually, preventing an escalation that never should have occurred.

Despite my physical stature (100 lbs) and lack of resistance, Officer Markoya arrested me in a manner that was both excessive and injurious. I suffered a wrist injury during the arrest. Moreover, he denied my mother's request to provide me with proper clothing, and during the approximately 40-minute transport to the Lake County facility in Waukegan, he rolled down the windows, subjecting me to unnecessary discomfort and distress.

The conduct of Officer Markoya was unprofessional. His actions reflect a deliberate indifference to due process, proper investigative procedure and the constitutional rights of a citizen. This wrongful arrest stems directly from failure of the Lake County Sheriff to properly communicate and interpret the original 911 call, which was not a criminal complaint.

This incident represents a clear example of wrongful arrest, and malicious charges. Legal redress is necessary not only for my own personal justice, but to ensure accountability and prevent similar miscarriages of justice in the future.